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Cyber Broadband provides wireless broadband internet service via radio to outlying areas with few viable options for broadband internet access using fixed wireless technology. We were incorporated in 2004 and are locally owned and operated.

December 27, 2017

TO: Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

SUBJECT: Promoting Investment in the 3550-3700 MHz Band.
Docket No. 17-258.

Dear United States Federal Communications Commission:

Cyber Broadband was founded in 2004 and provides broadband access to just under 1,000 residents and businesses across many counties in North Alabama including Blount, Cullman, Franklin, Lawrence, Morgan, Walker, and Winston. We continue to grow and expand our network based on demand and have also assisted in the startup of similar companies across rural parts of Alabama.

Our company utilizes radio gear that broadcasts in the 900 Mhz ISM band to deliver broadband service to our customers. In some areas we are also able to utilize the 2.4 ghz ISM band (which is also used for wifi) to deliver even higher speeds but recently we have been eyeing and beta testing new technologies available to us in the 3.65 band – including LTE technology now available for fixed wireless.

Our initial testing using equipment in this band has literally blown our minds. This new gear is finally meeting demands of our customers who have wanted faster service for years that the 900 mhz equipment we have just could not provide. Additionally, we are able to deploy service to customers further than our 2.4 ghz networks and should provide more speed than our 900 mhz networks, albeit at not such a great distance. The 3.65 equipment trials we have been testing in LTE show this equipment provides higher speeds at a greater distance – enabling us to deploy to meet the needs of even more customers.

Our existing 900 mhz gear can provide up to 3 meg service up to about six miles through pine trees as tall as 100 feet. The LTE gear we have been trialing appears to be able to offer up to 60 meg service at roughly 2/3rds the distance the 900 mhz gear can provide.

We currently have one base station on a tower serving six customers. We have been testing this equipment less than three months. We are literally salivating at the possibilities of this equipment but **are scared to death you guys will screw this up for us.**

Rumors of the proposed rule-making / changes to the CBRS (citizens broadband radio service) could make getting access to these new frequencies (and thus being able to deploy more radios and offer more bandwidth) nearly impossible. This nonsense we have been hearing of much larger licensing areas will make using this band financially impossible for us. **Upon further study, using census tracts is a much more economical method for us to lease spectrum in areas we plan to deploy** – and not areas we have no manpower or desire to deploy. We can exclude ourselves from high density areas in the existing large urban areas, which are largely already covered by existing fiber and cable companies. By using larger license areas, **you will price us out of the market!!**

Our customers demand more bandwidth. The equipment we currently use is barely meeting demands today and existing customers want more bandwidth and we cannot provide it for them with existing equipment. **The new equipment we are testing using 3.65 and LTE appears to be able to meet this demand. We must have access to the CBRS spectrum at an affordable cost to be able to provide this much needed service.** Many of the areas we are discussing do not even have cellular service.

Changing the rules so that only a few can play is un-American and disrupts competition.

To change the license sizes as you have proposed will make areas too too large for any small company to invest and capitalize in. Many members of the Wireless Internet Service Providers Association are the small guys – we are not AT&T, T-Mobile, Sprint, or Verizon. We are the people filling the gaps the big guys are overlooking (in many cases intentionally as providing service to rural areas is not easy....if it were, everyone would be doing it!)

Please reconsider this rule and allow us to continue delivering broadband to your constituents who need the service.

Thank you,

Jay Fuller
President / CEO
Cyber Broadband Inc

www.cyberbroadband.net
www.getcyber.net